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25 Attorneys for Plaintiff
26 UNITED STATES OF AMERICA

27 UNITED STATES DISTRICT COURT
28 FOR THE CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

29 UNITED STATES OF AMERICA,
30 Plaintiff,
31 v.
32 REAL PROPERTY IN LOS ANGELES,
33 CALIFORNIA,
34 Defendant.

No. 2:22-cv-02902

VERIFIED COMPLAINT FOR FORFEITURE
IN REM

18 U.S.C. §§ 981(a)(1)(A), (B),
and (C)

VERIFIED COMPLAINT FOR FORFEITURE IN REM

Plaintiff United States of America, by and through its undersigned attorneys, alleges:

1. This is an action to forfeit a multimillion-dollar mansion located in the Holmby Hills neighborhood of Los Angeles, California (APN 4359-013-027). Title to the real property is in the name of WRH, LLC, which is now known as WRH, Inc.

2. The defendant mansion was involved in, constitutes, is derived from, and is traceable to unlawful bribes paid for the benefit of Gagik Khachatryan ("KHACHATRYAN"), the former minister of finance of the Republic of Armenia, and his sons Gurgun Khachatryan ("GURGEN") and Artyom Khachatryan ("ARTYOM"), and related money-laundering transactions. The mansion is therefore subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A), (B), and (C).

PARTIES, PERSONS, AND ENTITIES

3. The plaintiff is the United States of America.

4. The defendant in rem is the real property in Los Angeles, California described in Exhibit A and all appurtenances, improvements, and attachments thereon, as well as leases, rents, and profits derived therefrom (the "Veto Estate").¹

5. From 2008 to 2016, Gagik KHACHATRYAN served first as the chairman of the State Revenue Committee and later as the minister of finance of the Republic of Armenia. He has been charged with crimes in Armenia, including receiving bribes in violation of Article 311 of the Criminal Code of the Republic of Armenia.

¹ Pursuant to Local Rule 5.2-1 of the Local Civil Rules for the Central District of California, the street address of this residential property is not set forth in this Complaint.

1 6. GURGEN and ARTYOM Khachatryan are the adult sons of Gagik
2 KHACHATRYAN. They have each been charged with crimes in Armenia
3 including receiving bribes in violation of Article 311 of the
4 Criminal Code of the Republic of Armenia.

5 7. Sedrak ARUSTAMYAN ("ARUSTAMYAN") is a prominent businessman
6 in Armenia. He was an executive officer of a consortium of Armenian
7 business entities known as Multi Group. He has been charged in
8 Armenia with paying bribes to KHACHATRYAN in violation of Article 312
9 of the Criminal Code of the Republic of Armenia.

10 8. Tadevos T. Khachatrian ("TED") is a relative of
11 KHACHATRYAN, GURGEN, and ARTYOM, who resides in Los Angeles,
12 California. TED served as a U.S.-based representative of
13 KHACHATRYAN, GURGEN, and ARTYOM.

14 9. The Veto Trust is a trust formed under the laws of
15 California by an agreement dated May 11, 2011. The agreement named
16 GURGEN and ARTYOM as trustors and beneficiaries and GURGEN and
17 Abraham Stepanian as the collective trustee. Stepanian resigned as
18 trustee shortly after the trust was formed; TED later replaced him in
19 that role. The Veto Trust purchased the Veto Estate on or around
20 August 5, 2011, with unlawful bribes paid by ARUSTAMYAN.

21 10. WRH, LLC was a limited liability company formed under the
22 laws of California on or around February 11, 2016. TED served as
23 WRH, LLC's manager. On or around May 15, 2019, WRH, LLC converted
24 into a stock corporation.

25 11. WRH, Inc. is a California stock corporation formed by the
26 conversion of WRH, LLC on or around May 15, 2019. TED is the chief
27 executive officer, chief financial officer, and secretary of WRH,
28

1 Inc. GURGEN and ARTYOM are the corporation's directors. WRH, Inc.
2 is the current title holder of the Veto Estate.

3 12. The interests of WRH, Inc. may be adversely affected by
4 these proceedings.

5 **JURISDICTION AND VENUE**

6 13. This Court has jurisdiction over civil actions commenced by
7 the United States under 28 U.S.C. § 1345 and over forfeiture actions
8 under 28 U.S.C. § 1355(a).

9 14. This Court may exercise in rem jurisdiction over the
10 defendant pursuant to 18 U.S.C. § 985(c).

11 15. Venue lies in this district pursuant to 28 U.S.C.
12 § 1355(b)(1) because acts or omissions giving rise to the forfeiture
13 occurred in this district. Venue also lies in this district pursuant
14 to 28 U.S.C. § 1395(b) because the defendant in rem is located in
15 this district.

16 **BASIS FOR FORFEITURE**

17 **I. The Corruption Scheme**

18 16. Throughout the 1990s and 2000s, KHACHATRYAN held various
19 positions in the tax and customs agencies of the Republic of Armenia.

20 17. On August 20, 2008, KHACHATRYAN was appointed chairman of
21 the State Revenue Committee of the Republic of Armenia, the
22 government agency responsible for the assessment and collection of
23 taxes under Armenian law. He remained in that position until his
24 appointment as minister of finance of the Republic of Armenia.

25 18. On April 26, 2014, KHACHATRYAN was appointed minister of
26 finance of the Republic of Armenia. At or around the same time that
27 KHACHATRYAN became minister of finance, the Ministry of Finance
28 assumed responsibility for the assessment and collection of taxes in

1 Armenia. Because KHACHATRYAN exercised both the minister of
2 finance's traditional responsibilities as well as responsibilities
3 for tax assessment and collection, he was known as the "Super
4 Minister."

5 19. KHACHATRYAN remained the minister of finance until on or
6 around September 8, 2016.

7 20. Sedrak ARUSTAMYAN ("ARUSTAMYAN") was an executive officer
8 or owner of more than 20 Armenian business entities, which were
9 subject to taxation under Armenian law. These entities included
10 Multi Leon; Multi Gaz; Multi Motors Ltd; Magas Invest PB; Shustov
11 Trading House PB; AR-BE Armenian-Belarus Trading House; Araratcement
12 PB; Yerevan's Ararat Cognac-Wine-Vodka Factory; Ecofish Trade Ltd;
13 Raps; Onira Club Ltd; Kotayk Beer Factory Ltd; and Jermuk Turboshin
14 Ltd.

15 21. While KHACHATRYAN was responsible for tax assessment and
16 collection in Armenia, ARUSTAMYAN made several unlawful payments to
17 KHACHATRYAN and his two sons GURGEN and ARTYOM. ARUSTAMYAN made the
18 payments to secure favorable tax treatment for his business entities.

19 22. ARUSTAMYAN, GURGEN, and ARTYOM created at least two sham
20 loan agreements to disguise these payments. The loan agreements were
21 shams in that no party expected the underlying loans to be repaid.

22 23. Loan-1. On or around July 9, 2009, approximately one year
23 after KHACHATRYAN was appointed chairman of the State Revenue
24 Committee of the Republic of Armenia, ARUSTAMYAN entered into a
25 \$7,000,000 sham loan agreement ("Loan-1") with GURGEN and ARTYOM.
26 According to the written terms of Loan-1, the loan was due to be paid
27 in full plus 4 percent interest on July 30, 2010. If the loan was
28

1 not repaid within the specified time, a penalty of 0.01 percent was
2 to be assessed per day.

3 24. On the date of the loan agreement, GURGEN and ARTYOM were
4 approximately 25 and 23 years old, respectively.

5 25. On July 29, 2010, the day before payment on the loan was
6 due, ARUSTAMYAN, GURGEN, and ARTYOM entered into an agreement to
7 extend Loan-1's repayment date to July 30, 2015 ("Amendment-1"). On
8 July 28, 2015, two days before the amended repayment date,
9 ARUSTAMYAN, GURGEN, and ARTYOM entered another agreement to extend
10 the repayment date to July 30, 2019 ("Amendment-2"). ARUSTAMYAN did
11 not charge any penalties or receive any consideration for the
12 extensions of the loan.

13 26. Loan-2. On or around July 10, 2011, ARUSTAMYAN entered
14 into a \$13,400,000 sham loan agreement ("Loan-2") with GURGEN and
15 ARTYOM. According to the written terms of Loan-2, the loan was due
16 to be paid in full plus 4 percent interest on July 10, 2016. As with
17 Loan-1, if the loan was not repaid within the specified time, a
18 penalty of 0.01 percent was to be assessed per day. As described
19 below, funds from ARUSTAMYAN corresponding to this loan amount were
20 used to purchase the Veto Estate. Nonetheless, as also described
21 below, ARUSTAMYAN did not obtain a security interest in the Veto
22 Estate.

23 27. On or around July 7, 2016, three days before Loan-2 was to
24 become due, ARUSTAMYAN, GURGEN, and ARTYOM entered into an agreement
25 to extend the repayment date to July 10, 2019 ("Amendment-3"). As
26 before, ARUSTAMYAN did not charge any penalties or receive any
27 consideration for the extension of the loan.

1 28. As of April 24, 2020, ARUSTAMYAN still had not received any
2 payment of principal or interest on either of his supposed loans.
3 Upon information and belief, he has not received any interest or
4 principal payment on either supposed loan to date.

5 29. In exchange for payments disguised as Loan-1 and Loan-2 and
6 other corrupt payments, KHACHATRYAN illegally used his influence to
7 reduce the tax liabilities of businesses affiliated with ARUSTAMYAN.

8 30. In 2018 and 2019, after KHACHATRYAN left public office,
9 Armenian tax authorities conducted retrospective tax inspections of
10 several companies for 2015, the last full year in which KHACHATRYAN
11 was minister of finance. The Armenian statute of limitations
12 restricted retrospective inspections for prior years.

13 31. The retrospective tax inspections found that several of
14 ARUSTAMYAN's companies had significant unpaid tax liabilities that
15 accrued while KHACHATRYAN was responsible for tax collection in
16 Armenia. The unpaid taxes included value-added tax, profit tax, and
17 excise tax.

18 32. For example, one of ARUSTAMYAN's companies, Araratcement
19 PB, was not subject to a tax inspection between at least 2009 and
20 2014, even though it appeared on the list of companies that was
21 supposed to be inspected at least in 2012. In 2015, KHACHATRYAN's
22 last full year in office, Araratcement PB was subject to a tax
23 inspection, but tax authorities determined that the company owed
24 unpaid taxes and penalties of only 10,020,716 Armenian dram (less
25 than \$25,000 USD). A retrospective inspection of Araratcement PB's
26 tax liability conducted after KHACHATRYAN left office found that
27 Araratcement PB actually owed 7,496,360,553 Armenian dram (more than
28 \$15,000,000 USD) in unpaid taxes and penalties in 2015, not the

1 significantly smaller sum that had been assessed while KHACHATRYAN
2 was in office.

3 33. Several other of ARUSTAMYAN's companies were also found
4 to have unpaid tax liabilities that should have been detected by tax
5 inspections while KHACHATRYAN was in office. For example, after
6 KHACHATRYAN left office, Multi Leon and Multi Gaz were found to have
7 owed 4,455,474,931 and 4,308,584,225 Armenian dram respectively (more
8 than \$9,000,000 USD each).

9 34. On or about August 27, 2019, Armenian authorities charged
10 KHACHATRYAN with abuse of power and embezzlement. On or about July
11 22, 2020, Armenian authorities charged KHACHATRYAN with receiving
12 bribes from ARUSTAMYAN under the cover of the sham loan agreements
13 signed by ARTYOM and GURGEN, which are described above as Loan-1 and
14 Loan-2. The charges and evidence have now been submitted to an
15 Armenian court for a ruling.

16 35. On or about April 28 and April 29, 2020, Armenian
17 authorities charged GURGEN and ARTYOM with receiving bribes on behalf
18 of their father and laundering the proceeds of the bribes through the
19 use of sham loan agreements. GURGEN and ARTYOM have fled Armenia.

20 36. On or about April 30, 2020, Armenian prosecutors charged
21 ARUSTAMYAN with paying bribes to KHACHATRYAN, GURGEN, and ARTYOM.

22 **II. The Purchase Of The Veto Estate**

23 37. KHACHATRYAN, GURGEN, and ARTYOM formed entities to receive,
24 disguise, and conceal illegal bribe payments and to disguise and
25 conceal their ownership of the Veto Estate. These entities include
26 the Veto Trust; WRH, Inc.; and WRH, LLC.

27 38. On or around July 7, 2011, the Veto Trust entered into a
28 \$14,400,000 Residential Purchase Agreement for the Veto Estate. The

Veto Estate, as described above, is a residential property located in Los Angeles, California. GURGEN signed the Residential Purchase Agreement on behalf of the Veto Trust. He did so with the intention that the Veto Estate would become a residence for the Khachatryan family.

39. As proof of their ability to make the purchase, GURGEN provided the seller's agent with a letter from an Armenian bank stating that GURGEN held over \$15,000,000 in an account at that bank. The letter, however, was false and the referenced account did not hold those funds.

40. Instead, the Veto Trust purchased the Veto Estate with illegal bribe payments from ARUSTAMYAN.

41. First, on July 8, 2011, ARUSTAMYAN caused approximately \$999,500 to be wired from an HSBC account in Armenia in his name to the Veto Trust's Bank of America account ending in '7103 in the United States.

No.	Date	Amount in USD	Sender	Recipient	Recipient's Bank
1.	7/8/2011	\$999,500.00	Arustamyan	Veto Trust	Bank of America

42. Four days later, on July 12, 2011, the Veto Trust used check No. 102 in the amount of \$1,000,000 drawn on the same Bank of America Account to open escrow with West Coast Escrow at Comerica Bank for purchase of the Veto Estate.

43. After the Veto Trust's initial \$1 million payment, ARUSTAMYAN paid the substantial remainder of the purchase price directly to West Coast Escrow at its account at Comerica Bank. From July 27, 2011 to August 3, 2011, ARUSTAMYAN caused the following wire

transfers to be made from HSBC Bank accounts in Armenia in his name to the West Coast Escrow account at Comerica Bank:

No.	Date	Amount in USD	Sender	Recipient	Recipient's Bank
2.	7/27/2011	\$1,998,981.00	Arustamyan	West Coast Escrow	Comerica Bank
3.	7/28/2011	\$1,998,980.50	Arustamyan	West Coast Escrow	Comerica Bank
4.	7/29/2011	\$1,998,980.05	Arustamyan	West Coast Escrow	Comerica Bank
5.	8/2/2011	\$2,398,780.60	Arustamyan	West Coast Escrow	Comerica Bank
6.	8/3/2011	\$5,005,477.25	Arustamyan	West Coast Escrow	Comerica Bank

44. Wires 2 through 6 in the above table total \$13,401,199.40. This sum corresponds to the amount of Loan-2, the \$13,400,000 sham loan agreement that ARUSTAMYAN entered with GURGEN and ARTYOM on July 10, 2011. Each of Wires 1 through 6 was an illegal bribe payment.

45. Despite having funded the purchase of the Veto Estate, ARUSTAMYAN signed an Escrow Modification on July 29, 2011, that read in part "Arustamyan Sedrak understands that he will not appear on title to subject property and relinquishes any claim to funds deposited herein."

46. The purchase of the Veto Estate closed on or around August 5, 2011.

47. On or around October 26, 2011, the Landry Design Group ("LDG"), a residential architecture firm based in Los Angeles, provided ARTYOM and GURGEN a proposal to design a new house on the Veto Estate property. GURGEN and ARTYOM told LDG that they wanted their children to attend school in Los Angeles and instructed them to design the home as their family's residence.

1 48. GURGEN and ARTYOM retained LDG to design a home at the Veto
2 Estate, which was to be constructed after the demolition of the
3 existing house. LDG issued a complete set of construction drawings
4 in or around December 2013, though it continued to revise the
5 drawings even after construction began.

6 49. The drawings called for a residence with at least 10
7 bedrooms (in addition to separate servants' quarters), a two-story
8 library, a wine cellar, a theater, a squash court, a "hammam," and an
9 indoor swimming pool. The bedrooms in the residence were labelled as
10 intended for GURGEN and his wife, ARTYOM and his wife, for the
11 children of both couples, for Angela (GURGEN and ARTYOM's sister),
12 and for guests.

13 50. One bedroom was labeled simply "Master Bedroom"; although
14 it was not identified on the drawings as such, this bedroom was
15 intended for KHACHATRYAN and his wife, Laura Yepremyan. When
16 Yepremyan met with designers, she provided guidance primarily on the
17 design of the "Master Bedroom."

18 51. Construction on the new residence began in 2015.

19 52. On or around May 13, 2016, the Veto Trust transferred title
20 to the Veto Estate to WRH, LLC. The trust transfer deed cited
21 California Revenue & Taxation Code § 11925(d), which concerns
22 transfers "that result[] solely in a change in the method of holding
23 title . . . and in which proportional ownership interests . . .
24 remain the same." Cal. R&T Code 11925(d).

25 53. On or around May 15, 2019, WRH, LLC converted into WRH,
26 Inc.

1 54. On or around April 7, 2022, the Veto Estate was listed as
2 for sale on TheMLS multiple listing service, a database used by real
3 estate brokers to advertise properties for sale.

4 **ALLEGATIONS OF FOREIGN LAW**

5 55. The laws of the Republic of Armenia criminalize bribery of
6 public officials and the receipt of bribe payments by public
7 officials.

8 56. Article 311 of the Criminal Code of the Republic of Armenia
9 makes it a criminal offense for a public official to receive a bribe
10 personally or through an intermediary.

11 57. Article 312 of the Criminal Code of the Republic of Armenia
12 makes it a criminal offense to give a bribe to a public official
13 personally or through an intermediary.

14 58. Article 313 of the Criminal Code of the Republic of Armenia
15 makes it a criminal offense to facilitate a bribe either by promoting
16 an agreement between the bribe payer and the bribe taker or by
17 implementing a previously reached agreement.

18 59. Each of the above offenses is punishable by imprisonment
19 for a term exceeding one year.

20 **FIRST CLAIM FOR RELIEF**
21 **(18 U.S.C. § 981(a) (1) (A))**

22 60. The preceding paragraphs are incorporated by reference as
23 if fully set forth herein.

24 61. The defendant in rem is property involved in, or traceable
25 to property involved in, a transaction in violation of 18 U.S.C.
26 §§ 1956(a) (1) (A) (i), 1956(a) (1) (B) (i), 1956(a) (2) (A),
27 1956(a) (2) (B) (i), 1956(h), and 1957.

1 62. For purposes of 18 U.S.C. §§ 1956 and 1957, "specified
2 unlawful activity" includes, among other things, "an offense against
3 a foreign nation . . . involving bribery of a public official." 18
4 U.S.C. § 1956(c) (7) (B) (iv).

5 63. As set forth above:

6 a. the defendant in rem is property involved in, or
7 is traceable to property involved in, a financial
8 transaction or attempted financial transaction involving
9 the proceeds of an offense against a foreign nation
10 involving bribery of a public official, which transaction
11 or attempted transaction was conducted with the knowledge
12 that the property involved in the transaction represented
13 the proceeds of some form of unlawful activity and with the
14 intent to promote the carrying on of specified unlawful
15 activity in violation of 18 U.S.C. § 1956(a) (1) (A) (i);

16 b. the defendant in rem is property involved in, or
17 is traceable to property involved in, a financial
18 transaction or attempted financial transaction involving
19 the proceeds of an offense against a foreign nation
20 involving bribery of a public official, which transaction
21 or attempted transaction was conducted with the knowledge
22 that the property involved in the transaction or attempted
23 transaction represented the proceeds of some form of
24 unlawful activity and that the transaction or attempted
25 transaction was designed in whole or in part to conceal or
26 disguise the nature, the location, the source, the
27 ownership, or the control of the proceeds of specified
28

1 unlawful activity in violation of 18 U.S.C.

2 § 1956(a) (1) (B) (i);

3 c. the defendant in rem is property involved in, or
4 is traceable to property involved in, the transportation,
5 transmission, or transfer, or the attempted transportation,
6 transmission, or transfer, of a monetary instrument or
7 funds to a place in the United States from or through a
8 place outside the United States with the intent to promote
9 the carrying on of an offense against a foreign nation
10 involving bribery of a public official in violation of 18
11 U.S.C. § 1956(a) (2) (A);

12 d. the defendant in rem is property involved in, or
13 is traceable to property involved in, the transportation,
14 transmission, or transfer, or the attempted transportation,
15 transmission, or transfer, of a monetary instrument or
16 funds to a place in the United States from or through a
17 place outside the United States, with the knowledge that
18 the monetary instruments or funds represented the proceeds
19 of some form of unlawful activity and with the knowledge
20 that the transportation, transmission, or transfer, or
21 attempted transportation, transmission, or transfer, was
22 designed in whole or in part to conceal or disguise the
23 nature, the location, the source, the ownership, or the
24 control of the proceeds of an offense against a foreign
25 nation involving bribery of a public official in violation
26 of 18 U.S.C. § 1956(a) (2) (B) (i);

27 e. the defendant in rem is property involved in, or
28 is traceable to property involved in, a monetary

1 transaction or attempted monetary transaction, affecting
 2 interstate or foreign commerce, in criminally derived
 3 property of a value greater than \$10,000 derived from an
 4 offense against a foreign nation involving bribery of a
 5 public official, which transaction or attempted transaction
 6 was conducted with the knowledge that the property involved
 7 was criminally derived in violation of 18 U.S.C. § 1957;
 8 and

9 f. the defendant in rem is property involved in, or
 10 traceable to property involved in, a conspiracy in
 11 violation of 18 U.S.C. § 1956(h). Specifically, the
 12 defendant in rem is property involved in, or traceable to
 13 property involved in, a conspiracy to commit the violations
 14 of 18 U.S.C. §§ 1956(a)(1)(A)(i), 1956(B)(i),
 15 1956(a)(2)(A), 1956(a)(2)(B)(i), and 1957 set forth in
 16 subparagraphs a through e above.

17 64. For each of the above reasons, the defendant in rem is
 18 subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(A).

19 **SECOND CLAIM FOR RELIEF**
 20 **(18 U.S.C. § 981(a)(1)(B))**

21 65. The preceding paragraphs are incorporated by reference as
 22 if fully set forth herein.

23 66. The defendant in rem is property that constitutes, is
 24 derived from, or is traceable to proceeds obtained directly or
 25 indirectly from an offense against a foreign nation involving bribery
 26 of a public official, or was used to facilitate such an offense,
 27 which offense is a specified unlawful activity under 18 U.S.C.
 28 § 1956(c)(7)(B)(iv) that would be punishable for a term of

1 imprisonment exceeding one year within the foreign jurisdiction and
2 would be punishable under the laws of the United States by
3 imprisonment for a term exceeding one year, if the act or activity
4 constituting the offense had occurred within the jurisdiction of the
5 United States.

6 67. The defendant in rem is therefore subject to forfeiture
7 pursuant to 18 U.S.C. § 981(a)(1)(B).

8 **THIRD CLAIM FOR RELIEF**
9 **(18 U.S.C. § 981(a)(1)(C))**

10 68. The preceding paragraphs are incorporated by reference as
11 if fully set forth herein.

12 69. The defendant in rem is property that constitutes, or is
13 derived from, proceeds traceable to an offense against a foreign
14 nation involving bribery of a public official, which is a specified
15 unlawful activity under 18 U.S.C. § 1956(c)(7)(B)(iv), or a
16 conspiracy to commit such an offense.

17 70. The defendant in rem is therefore subject to forfeiture
18 pursuant to 18 U.S.C. § 981(a)(1)(C).

19 **PRAYER FOR RELIEF**

20 WHEREFORE, Plaintiff the United States of America requests:

21 (i) that the defendant in rem be proceeded against according to
22 the law and the rules of this Court, and that due notice be given to
23 all the interested parties to appear and show cause why forfeiture
24 should not be decreed;

25 (ii) that the Court, for the reasons set forth herein, adjudge
26 and decree that the defendant in rem be forfeited to the United States
27 of America and disposed of in accordance with existing laws, together
28

1 with costs; and

2 (iii) that the Court order such other relief as it deems just,
3 appropriate and in accordance with law.
4

5 Respectfully submitted,

6
7 DATED: May 2, 2022

DEBORAH CONNOR, Chief
D. HUNTER SMITH, Trial Attorney
Money Laundering and Asset Recovery Section
Criminal Division
United States Department of Justice

10 TRACY L. WILKISON
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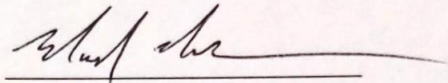
15
16 /s/ Maxwell Coll

17 MAXWELL COLL
Assistant United States Attorney

18
19 Attorneys for Plaintiff
UNITED STATES OF AMERICA
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VERIFICATION

I, Mark Newhouse, hereby verify and declare under penalty of perjury that I am a Special Agent with the Federal Bureau of Investigation, that I have read the foregoing Verified Complaint for Forfeiture In Rem and know the contents thereof, and that the factual allegations contained in the Verified Complaint are true to the best of my knowledge and belief.



SA Mark Newhouse

Executed this 2 day of May, 2022 in Los Angeles, California.